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Greater Nevada Credit Union*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

POLARIS PROCESSING, LLC,

Plaintiff,

v.

NEW RISE RENEWABLES RENO, LLC,

Defendant.

NEW RISE RENEWABLES RENO, LLC,

Counter-Complainant,

v.

POLARIS PROCESSING, LLC, Individual
DOES 1-10; ROES 1-10, inclusive,

Counter-Defendants.

NEW RISE RENEWABLES RENO, LLC,

Third-Party Plaintiff,

v.

TERRY FRIEDMAN & JULIE THROOP,
PLLC; JOHN C. BOYDEN, ESQ., an individual;
GREATER NEVADA CREDIT UNION, a
domestic non-profit cooperative corporation;
TRUIST BANK, NORTH CAROLINA, a
Tennessee Corporation; KING FIRM LLC, a
fictitious corporation; DOES 1-10; ROE
BUSINESS and ROE CORPORATIONS 1-10,
inclusive

Third-Party Defendants.

Case No. 2:24-cv-01907-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND TIME FOR THIRD-PARTY
DEFENDANT GREATER NEVADA
CREDIT UNION TO FILE ITS REPLY
IN SUPPORT OF ITS MOTION TO
DISMISS NEW RISE RENEWABLES
RENO, LLC'S THIRD-PARTY
COMPLAINT**

(FIRST REQUEST)

1 IT IS HEREBY STIPULATED by and between Third-Party Plaintiff NEW RISE
2 RENEWABLES RENO, LLC (“New Rise”), by and through their counsel, the law firm of Ranalli,
3 Zaniel, Fowler & Moran, LLC, and Third-Party Defendant GREATER NEVADA CREDIT
4 UNION (“GNCU”), by and through its counsel, the law firm of Jackson Lewis P.C., that the
5 deadline for GNCU to file its Reply in support of its Motion to Dismiss Third-Party Plaintiff’s New
6 Rise Renewables Reno, LLC Third-Party Complaint (ECF No. 33) shall be extended from February
7 7, 2025 to **February 14, 2025**. This Stipulation is submitted and based upon the following:

8 1. On January 17, 2025, GNCU filed its Motion to Dismiss Third-Party Plaintiff’s New
9 Rise Renewables Reno, LLC Third-Party Complaint. ECF No. 33.

10 2. On January 31, 2025, New Rise filed its Opposition to GNCU’s Motion to Dismiss.
11 ECF No. 35.

12 3. Pursuant to LR 7-2(b), “[t]he deadline to file and serve any reply in support of the
13 [Motion to Dismiss] is seven days after service of the” Opposition. As a result, GNCU’s Reply is
14 currently due on February 7, 2025.

15 4. The undersigned counsel for GNCU will be out of the office travelling
16 internationally from February 3rd to February 10, 2025.

17 5. As such, GNCU’s requires additional time to confer with GNCU’s representatives
18 regarding the Reply and complete preparing the Reply.

19 6. The parties hereby stipulate and agree that good cause supports **extending the time**
20 **for GNCU to file its Reply in support of its Motion to Dismiss Third-Party Plaintiff’s New Rise**
21 **Renewables Reno, LLC Third-Party Complaint from February 7, 2025, to February 14, 2025.**

22 7. This is GNCU’s first request for an extension of time to file its Reply in support of
23 its Motion to Dismiss Third-Party Plaintiff’s New Rise Renewables Reno, LLC Third-Party
24 Complaint.

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8. This stipulation is made in good faith and not for the purpose of delay.

Dated this 3rd day of February, 2025.

RANALLI, ZANIEL, FOWLER & MORAN, JACKSON LEWIS P.C.
LLC

/s/ David M. Zaniel
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*Attorneys for Third-Party Defendant
Greater Nevada Credit Union*

ORDER

IT IS SO ORDERED.



United States District Court Judge

Dated: 2/6/25

4917-2830-2869, v. 1